

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 25-30002
)	(Chapter 11)
GENERATIONS ON 1ST, LLC)	
)	
Debtor)	
_____)	
)	
In re:)	Case No. 25-30003
)	(Chapter 11)
PARKSIDE PLACE, LLC)	
)	
Debtor)	Jointly Administered
_____)	

MOTION TO EXPEDITE

Come now Generations on 1st, LLC (“Generations”) and Parkside Place, LLC (“Parkside”) (collectively, the “Debtors,” and each a “Debtor”), by and through undersigned counsel, pursuant to Local Rule 9006-1, and move this Honorable Court to hold an expedited hearing, via telephone or video conference, in consideration of the Debtors’ Motion to Approve Stipulation (the “Motion”), and in support thereof state as follows:

Three weeks ago, in furtherance of efforts of a third party non-debtor to refinance an asset securing one or more loans on which the Debtors are obligated, Red River State Bank (“RRSB”) and the Debtors entered into a stipulation (the “Stipulation,” as found at docket entry #92). The deadline for the subject asset to be refinanced—or, as it is, redeemed from foreclosure—is June 12, 2025. The Debtors believed the Stipulation, in turn, would quell any bankruptcy-centric concerns of lenders or title agents. But, alas, it seems such concerns may not be fully dispelled absent an order approving the Stipulation.

Accordingly, the Motion now seeks judicial approval of the Stipulation. As set forth in the Motion, such will monetarily—and subjectively—benefit the Debtors and their estates. And, as

also set forth in the Motion, such is not particularly controversial: the Stipulation is, in essence, tantamount to the mildest iteration of a comfort order, simply reciting that the automatic stay set forth in Section 362 of Title 11 of the United States Code does not inform the actions of non-debtors in connection with property that is not an asset of a debtor's estate.

Given (i) the time sensitive nature of this issue; (ii) the benefit that will accrue to the Debtors and their estates if the subject property can be refinanced; and (iii) the fact that the Stipulation is already endorsed by the largest creditor in these cases (and a creditor that has scarcely found agreement with the Debtors, no less), it is respectfully urged that the Motion can—and should—be considered on an expedited basis.

Pursuant to Local Rule 9006-1, the Debtors more formally note as follows:

- a. The grounds of the Motion are set forth therein;
- b. The Debtors propose a telephonic or video conference hearing date of Friday, May 30, 2025, after 1:00 pm Central Time,¹ for the Motion, with such hearing to be cancelled if no timely opposition is filed;
- c. The Debtors propose responses to the Motion be due by 5:00 pm prevailing central time on Wednesday, May 28, 2025; and
- d. While the Debtors are cognizant that Local Rule 9006-1 only permits hearings on “less than seven days” notice in “extraordinary circumstances,” the Debtors respectfully submit that the relief sought is “extraordinary” inasmuch as the Stipulation has now been on file for a full three weeks without any concerns being raised by any party in interest, while the deadline to

¹ Undersigned counsel will be traveling to the Arizona/Nevada region, so as to tend to various personal matters over the weekend and then attend the annual National Association of Bankruptcy Trustees conference, with such travel scheduled for the morning of May 30, 2025. If a hearing is to be held, an afternoon time is preferable solely for this reason.

redeem the at-issue property from foreclosure (June 12, 2025) is now rapidly nearing. Some modicum of time will be needed, between entry of an order approving the Stipulation and closing on a refinancing of the property, to permit appropriate closing documents to be drawn up; the scarcity of remaining days before the deadline for such militates in favor of an unusually shortened notice period.

Respectfully Submitted,

Dated: May 26, 2025

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
The Dakota Bankruptcy Firm
1630 1st Avenue N
Suite B PMB 24
Fargo, North Dakota 58102-4246
Phone: (701) 394-3215
mac@dakotabankruptcy.com
Counsel for the Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of May, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig